

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

William R. Harris, Jr.

Debtor

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Chapter 13

Case No. 19-12903-mdc

**DEBTOR'S RESPONSE TO MOVANT'S MOTION FOR RELIEF FROM THE
AUTOMATIC STAY**

Debtor-Respondent, William R. Harris, Jr., (hereafter "Debtor") responds to the Motion of U.S. Bank National Association (Trustee for the Pennsylvania Housing Finance Agency, Pursuant to a Trust Indenture Dated as of April 1, 1982) for Relief from the Automatic Stay, as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Denied. The Debtor proposes to cure the arrears by having his attorney holding certified funds in the amount of \$2,000.00 by the hearing date. He proposes to cure the remaining arrears over the next six months.
10. Admitted.
11. Admitted.

WHEREFORE, Debtor respectfully request an Order denying Nissan's Motion.

Dated: June 15, 2021

BY: /s/ Christopher G. Cassie, Esq.
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